

# **EXHIBIT I**

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

PAVLE ZIVKOVIC, on behalf of himself and others  
similarly situated,

Plaintiff,

v.

LAURA CHRISTY LLC d/b/a VALBELLA,  
LAURA CHRISTY MIDTOWN LLC, DAVID  
GHATANFARD, and GENCO LUCA,

Defendants.

USDC SDNY  
DOCUMENT  
ELECTRONICALLY FILED  
DOC #:  
DATE FILED: August 14, 2023

No. 17-cv-00553-GHW

**ORDER TO SHOW CAUSE WHY  
JUDGMENT DEBTOR DAVID  
GHATANFARD SHOULD NOT BE  
HELD IN CONTEMPT**

Upon the memorandum of law of Plaintiff Pavle Zivkovic, the declaration of Lucas C. Buzzard and the supporting documents attached thereto, and upon copies of an information subpoena issued to Defendant-Judgment-Debtor David Ghatanfard on August 1, 2022 and a subpoena duces tecum issued to Defendant-Judgment-Debtor David Ghatanfard on January 12, 2023, annexed thereto, it is


ORDERED that Defendant-Judgment-Debtor Ghatanfard shall file a written response to Plaintiff's application for an order to show cause of no more than 25 pages by no later than August 25, 2023; Plaintiff shall file a reply thereto of no more than 10 pages by no later than September 1, 2023; it is further

ORDERED that Defendant-Judgment-Debtor Ghatanfard shall show cause before the Honorable Gregory H. Woods, in Room 12C of the United States District Court for the Southern District of New York, Daniel Patrick Moynihan U.S. Courthouse at 500 Pearl Street, New York, NY, on September 19, 2023, at 4:00 p.m., or as soon thereafter as counsel may be heard, why an order should not be issued:

1. Finding Ghatanfard guilty of civil contempt of court for willfully failing to comply with Plaintiffs' subpoena duces tecum dated January 12, 2023;
2. Finding Ghatanfard guilty of civil contempt of court for "false swearing" in response to written question posed in Plaintiffs' information subpoena dated August 1, 2022;
3. Ordering Ghatanfard to fully comply with the information subpoena and subpoena duces tecum within fourteen (14) days to purge his contempt;
4. Ordering Ghatanfard to pay a monetary fine each day until he fully complies with the information subpoena and subpoena duces tecum;
5. Ordering Ghatanfard to pay Plaintiff's counsel's attorney's fees and costs associated with bringing this application;
6. Ordering that if Ghatanfard fails to comply with the foregoing, Plaintiffs may move for any appropriate additional relief; and it is further

ORDERED that service a copy of this order and annexed affidavit, supporting documents, and papers upon Mr. Ghatanfard's counsel of record in this action via the Court's electronic filing system on or before August 16, 2023, shall be deemed proper and sufficient service thereof. Plaintiff shall, in addition, effect service by electronically serving the aforementioned documents on counsel for Mr. Ghatanfard by email.

Dated: New York, NY  
August 14, 2023

  
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Honorable Gregory H. Woods  
United States District Judge